

1 RENE L. VALLADARES
Federal Public Defender
2 Nevada State Bar No. 11479
BRIAN PUGH
3 Assistant Federal Public Defender
411 E. Bonneville, Ste. 250
4 Las Vegas, Nevada 89101
(702) 388-6577/Phone
5 (702) 388-6261/Fax
Brian_Pugh@fd.org
6

7 Attorney for Bailey Aaron Hall

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 BAILEY AARON HALL,

15 Defendant.
16

Case No. 2:16-cr-321-JAD-PAL

**STIPULATION TO CONTINUE
SENTENCING HEARING**
(Second Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Dayle Elieson, United
18 States Attorney, and Alexandra Michael, Assistant United States Attorney, counsel for the
19 United States of America, and Rene L. Valladares, Federal Public Defender, and Brian Pugh,
20 Assistant Federal Public Defender, counsel for Bailey Aaron Hall, that the Sentencing Hearing
21 currently scheduled on Thursday, May 21, 2018, be vacated and continued to a date and time
22 convenient to the Court, but no sooner than ninety (90) days.

23 The Stipulation is entered into for the following reasons:

- 24 1. Counsel for the defendant will be out of state on another case from May 21-23,
25 2018.
26 2. The defendant is incarcerated and does not object to the continuance.

1 3. The parties agree to the continuance.

2 4. The additional time requested herein is not sought for purposes of delay, but
3 merely to allow counsel for defendant sufficient time within which to be able to effectively and
4 complete investigation of the discovery materials provided.

5 5. Additionally, denial of this request for continuance could result in a miscarriage
6 of justice. The additional time requested by this Stipulation is excusable in computing the time
7 within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18, United
8 States Code, Section 3161(h)(7)(A), considering the factors under Title 18, United States Code,
9 Section 3161(h)(7)(B)(i), (iv).

10 This is the second stipulation, first request by the defendant, to continue filed herein.

11 DATED this 19th day of April, 2017.

12 RENE L. VALLADARES
13 Federal Public Defender

 STEVEN MYHRE
 Acting United States Attorney

14 /s/ *Brian Pugh*
15 By _____

 /s/ *Alexandra Michael*
 By _____

16 BRIAN PUGH
17 Assistant Federal Public Defender

 ALEXANDRA MICHAEL
 Assistant United States Attorney

1

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16


17

18

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26

The continuance sought herein is excusable under the Speedy Trial Act, Title 18, United States Code, Section § 3161 (h)(7)(A), when the considering the factors under Title 18, United States Code, § 3161(h)(7)(B)(i), (iv).

IT IS THEREFORE ORDERED that the sentencing hearing currently scheduled for ~~Thursday~~, May 21, 2018 at 9:00 a.m., be vacated and continued to August 20, 2018 at the hour of 10:00 a.m.


UNITED STATES DISTRICT JUDGE